UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

APR 10 2003

Aaron Miller
Project Coordinator
881 Main Street
Herculaneum, MO 63048

40322441
Superfund

Dear Mr. Miller:

RE: Materials Handling Plan and Transportation Plan - March 2003 Revision for the Herculaneum Lead Smelter Site

The United States Environmental Protection Agency (EPA) has reviewed the subject document and is providing the following comments that should be addressed in a revised submittal. As noted on prior occasions, Doe Run is responsible for preventing the release of lead onto the roads in Herculaneum as well as development of operational controls that prevent such releases. Street data as well as "Green zone data" indicate continued tracking and releases of lead bearing materials from the Herculaneum smelter operation.

1. EPA recently collected background street samples from the town of Hillsboro, Missouri, that detected a maximum lead concentration and loading of 113 parts-per-million (ppm) and 0.072 milligrams per square foot (mg/ft^2) respectively. EPA believes that the streets of Herculaneum, when cleaned, should also have lead concentrations and loadings in these ranges For the purposes of evaluating the effectiveness of the Materials Transportation Plan and Handling Plan, threshold pavement criteria for the green/blue zones and Herculaneum streets will be established at 400 ppm and 0.22 mg/ft^2 i.e., approximately three times the background levels.

2 The Plan should indicate that all pavement threshold confirmation sampling will be randomly conducted by EPA personnel and that this data will be the only data evaluated for pavement cleaning confirmation and contingency measures implementation. EPA will provide a minimum of one-hour notice when samples will be collected from Doe Run property and a request for an escort (if required) will be made at that time.

3. Data indicates that street cleaning and green/blue zone cleaning are ineffective in thoroughly cleaning these areas of lead bearing materials. Our on-site trials have shown a supersucker vacuum truck to be more effective at cleaning lead dust from street pavement. At a minimum, Doe Run should include this technology in the revised Plan as a measure of cleaning streets and the green/blue zones. Sections of the Plans that discuss street sweeping should be edited accordingly. EPA welcomes any Doe Run effort and input in developing pavement cleaning protocols, as this remains a fundamental challenge and concern at this site.

4. The Plan should include the measures to be taken at the concentrate truck loading sites that will ensure that leaking will not occur while in route to the smelter. Truck washing at the loading sites is also recommended.

5. The Plan should indicate clearly that all concentrate delivery trucks will be washed in the enclosed truck wash prior to leaving the facility. The first sentence of Section 3.1.4 should be deleted. The first sentence of Section 3.1.4.1 should start: "Doe run will route all vehicles...."

6 Section 3.1.4.1, seventh paragraph, second sentence should be edited to read. "If after one month .... ."

7. Section 3.1.4.1, eighth paragraph: The Plan should include a third contingency measure of weekly cleaning of all Herculaneum streets using a supersucker truck or similar apparatus that achieves the pavement threshold criteria. This measure should also be added to section 3.1 5.10 of the Plan.

8. Section 3 1.5 10. The second sentence of this section should be edited to read, "If after one month of the implementation of this Plan. EPA road sampling and/or green/blue zone sampling exceeds the pavement threshold criteria. Doe Run will within 6 months. implement the following contingency.

Because of the urgency of this issue, EPA is requesting a revised Plan by Friday. April 18, 2003. Please contact me at 913-551-7755 if you have any questions concerning these comments.

Sincerely,

Bruce A. Morrison
Project Manager
Superfund Division

cc: Robert Hinkson, MDNR
Dave Mosby, MDNR
Dan Vornberg, DRC